## Exhibit 1

From:

Gregory R. Grant

Sent:

Tuesday, August 14, 2018 1:35 PM

To:

'Margaret Debler'; 'Michigan Billy'; WebbA2@michigan.gov; Schultz, Jared (AG);

cforsyth@grandtraverse.org; Paula Rosenthal

Cc:

Laurie Robbins

Subject:

RE: REQUEST FOR STIPULATION RE: LATE DISCLOSURE

Mr. Spencer,

We echo the request for concurrence by Ms. Debler and we will be filing a similar motion for summary judgment with the same arguments. Please indicate whether you will oppose this motion.

From: Margaret Debler [mailto:mdebler@jrsjlaw.com]

Sent: Tuesday, August 14, 2018 1:26 PM

To: 'Michigan Billy' <williamsimspencer@gmail.com>; WebbA2@michigan.gov; Schultz, Jared (AG)

<Schultzj15@michigan.gov>; cforsyth@grandtraverse.org; Gregory R. Grant <ggrant@cmda-law.com>; Paula Rosenthal

om>

Subject: RE: REQUEST FOR STIPULATION RE: LATE DISCLOSURE

Hello Mr. Spencer,

On behalf of prosecutor Cooney, we intend to file a Motion for Summary Judgment. I am seeking your concurrence in the relief sought, dismissal of your case against him. The motion is based, in large part, on the Prosecutor's entitlement to immunity from your claims, and our position that the federal court should not hear your arguments but instead allow the state court to decide them. We have also raised that probable cause was established for you arrest and prosecution and this finding bars your claims.

If I do not receive your concurrence today, I will assume that you oppose the motion and relief sought, and will file our motion.

From: Michigan Billy <williamsimspencer@gmail.com>

Sent: Sunday, August 05, 2018 3:59 PM

To: WebbA2@michigan.gov; Schultz, Jared (AG) < Schultzj15@michigan.gov >; cforsyth@grandtraverse.org;

ggrant@cmda-law.com; Margaret Debler <mdebler@jrsjlaw.com>

Subject: REQUEST FOR STIPULATION RE: LATE DISCLOSURE

Hello everybody. I apologize for being late with my disclosures. My HP notebook crashed and its taken me a while to recover enough information to proceed. I'm asking you all to please extend me a little grace and stipulate to my late disclosures. It won't happen again.

My disclosures are attached. Please let me know if we're good.

Thanks,

**Bill Spencer** 

